

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Ryan Scott MORGAN,
Anthony VASQUEZ,
Julie MORA

Defendants.

Magistrate Docket No.

COMPLAINT FOR VIOLATION OF:

Title 8, USC 1324(a)(1)(A)(ii)
Transportation of Illegal Aliens

Title 8, USC 1324(a)(1)(A)(ii) and (v)(I)
Conspiracy to Transport Illegal Aliens

The undersigned complainant being, duly sworn, states:

COUNT ONE

On or about April 21, 2014, within the Southern District of California, defendant Ryan Scott MORGAN, with the intent to violate the immigration laws of the United States, knowing or in reckless disregard of the fact that certain aliens, namely, Hipolito SALAS-Salas, Alejandro GUZMAN-Quintero, Jose Alfredo GUZMAN-Quintero and Julio SALAS-Ponce, had come to, entered and remained in the United States in violation of law, did transport and move, said aliens within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

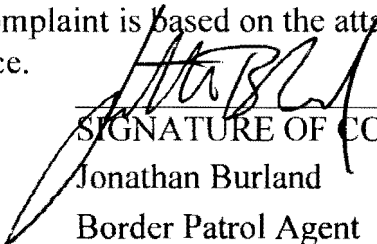
COUNT TWO

On or about April 21, 2014, within the Southern District of California, defendants Anthony VASQUEZ and Julie MORA, with the intent to violate the immigration laws of the United States, knowing or in reckless disregard of the fact that certain aliens, namely, Hipolito SALAS-Salas, Alejandro GUZMAN-Quintero, Jose Alfredo GUZMAN-Quintero and Julio SALAS-Ponce had come to, entered and remained in the United States in violation of law, did conspire to transport and move, said aliens within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and (v)(I).

DOA 4/21/14

TUM
4-23-14
x 7930

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



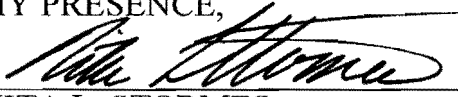
SIGNATURE OF COMPLAINANT

Jonathan Burland

Border Patrol Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE,

THIS 23rd DAY OF April, 2014 .



NITA L. STORMES

United States Magistrate Judge

CONTINUATION OF COMPLAINT:

Ryan Scott MORGAN, Anthony VASQUEZ, Julie MORA

PROBABLE CAUSE STATEMENT

Furthermore, the complainant states that Hipolito SALAS-Salas, Alejandro GUZMAN-Quintero, Jose Alfredo GUZMAN-Quintero and Julio SALAS-Ponce, are citizens of a country other than the United States; that said aliens have admitted that they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial by subpoena; and they are material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On April 21, 2014, Border Patrol Agent R. Muro was assigned to the Campo Border Patrol Station's area of operations. At approximately 2:15 p.m., BPA Muro was traveling south on Tierra Del Sol Road when a citizen informed him of several individuals climbing into a white sedan north of his location. Agent Muro drove north on Tierra Del Sol Road and located the vehicle the citizen had described to him. As Agent Muro followed the vehicle, he observed it uncharacteristically bounce over bumps and appeared to be heavily laden. Agent Muro then activated his lights and siren and the vehicle pulled over to the shoulder of the road. This area is located approximately six miles north of the United States/Mexico International Boundary and eighteen miles east of the Tecate, California Port of Entry. Agent Muro was joined shortly after by Border Patrol Agent B. Blanchard.

As Agent Muro approached the vehicle, he observed a person concealed under a blanket in the rear seat. Agent Muro approached the driver side door, identified himself as a Border Patrol Agent and conducted an immigration inspection on the driver, later identified as the defendant Ryan Scott MORGAN, who did not respond. Agent Muro instructed MORGAN to exit the vehicle. MORGAN then stated he had just picked up some hitchhikers. Agent Muro asked MORGAN if the hitch hikers were illegal aliens and MORGAN answered "yes." Agent Blanchard asked MORGAN if there were other people in the car and MORGAN stated there were.

Agent Blanchard identified himself as a Border Patrol Agent and conducted an immigration inspection on the individual in the rear seat of the vehicle. The subject, later identified as material witness Hipolito SALAS-Salas, stated he is a citizen of Mexico without any documents which would allow him to be present in the United States legally. Agent Blanchard opened the trunk of the vehicle and encountered three other individuals inside. Agent Blanchard identified himself as a Border Patrol Agent and conducted an immigration inspection on the subjects. All three individuals, later identified as material witnesses Jose Alfredo GUZMAN-Quintero, Julio SALAS-Ponce, and Alejandro GUZMAN-Quintero, stated they are citizens of Mexico without

CONTINUATION OF COMPLAINT:

Ryan Scott MORGAN, Anthony VASQUEZ, Julie MORA

any documents which would allow them to be present in the United States legally. At approximately 2:30 p.m., Agent Muro arrested MORGAN for alien smuggling while Agent Blanchard arrested SALAS-Salas, SALAS-Ponce, Jose GUZMAN-Quintero and Alejandro GUZMAN-Quintero.

During his post Miranda statement, MORGAN identified defendants Anthony VASQUEZ and Julie MORA as the individuals who hired him and coordinated the alien smuggling event. MORGAN told agents the location of the hotel at which he was supposed to meet VASQUEZ and MORA.

Border Patrol Agents J. Rodriguez and L. Hayes II arrived at the hotel and observed a vehicle, based on records checks, which was registered to MORA. Agent Rodriguez was informed by the employee working the front desk which room was rented to MORA. Agent Rodriguez knocked on the door to MORA's room, identified himself as a Border Patrol Agent and was granted permission to enter the room by MORA. Upon entering the room, agents noticed VASQUEZ inside. Agent Hayes instructed VASQUEZ to follow him outside for questioning. During questioning, Agent Rodriguez confirmed the identity of MORA. At approximately 6:45 p.m., Agent Rodriguez arrested MORA and Agent Hayes arrested VASQUEZ.

Defendant Ryan Scott MORGAN was read his Miranda rights and agreed to speak without an attorney present. MORGAN stated he was hired by Anthony VASQUEZ and Julie MORA to pick up illegal aliens and smuggle them to Los Angeles, California. MORGAN stated that he was to be paid \$1,000 for each alien he smuggled. MORGAN stated VASQUEZ and MORA provided him with maps and directions for picking up and delivering the aliens. MORGAN stated he directed the aliens into the trunk and rear seat of the vehicle during pick-up. MORGAN identified VASQUEZ and MORA as the coordinators.

Defendant Anthony VASQUEZ was read his Miranda rights and agreed to speak without an attorney present. VASQUEZ stated he recruited a driver approximately one week ago in Long Beach, California. VASQUEZ stated he acted as a middle man between the driver and a coordinator in Mexico. VASQUEZ stated he guided the driver via cell phone. VASQUEZ stated he was to be paid \$500 per alien he helped smuggle.

Defendant Julie MORA was read her Miranda rights and agreed to speak without an attorney present. MORA stated VASQUEZ initiated their roles in several smuggling events. MORA stated she had paid for hotel rooms, rental cars and given cash to drivers she and VASQUEZ

Turn
CONTINUATION OF COMPLAINT:

Ryan Scott MORGAN, Anthony VASQUEZ, Julie MORA

had recruited. MORA stated VASQUEZ was the main organizer. MORA stated she knew she and VASQUEZ were facilitating an alien smuggling event.

Material Witnesses Alajandro GUZMAN-Quintero, Jose GUZMAN-Quintero, Julio SALAS-Ponce and Hipolito SALAS-Salas stated that they are citizens of Mexico illegally present in the United States. They stated they do not possess any immigration documents which would allow them to be present in the United States legally. They stated they made arrangements to pay \$6,000 each to be smuggled into the United States.